

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	CHAPTER 7
	:	
TAHIRA M. WYATT	:	BANKRUPTCY NO. 25-12547 (DJB)
	:	
Debtor	:	
	:	

**VERIFIED STATEMENT IN SUPPORT OF
APPLICATION OF ROBERT W. SEITZER, CHAPTER 7 TRUSTEE,
TO EMPLOY KARALIS PC AS COUNSEL**

In accordance with Bankruptcy Rule 2014, I, Robert W. Seitzer, hereby state as follows:

1. I am an attorney, duly admitted to practice in the Commonwealth of Pennsylvania and in this Court.
2. I am a Partner of the law firm of Karalis PC ("KPC"), 1900 Spruce Street, Philadelphia, Pennsylvania 19103.
3. I submit this Verified Statement in support of the Application of Robert W. Seitzer, Chapter 7 Trustee (the "Trustee"), to Employ Karalis PC as Counsel.
4. KPC has no connection with the Debtor, creditors or any other parties in interest, their respective attorneys or accountants pursuant to Bankruptcy Rule 2014.
5. Neither I nor any member of my firm has any connection with any party in interest, their respective attorneys or accountants, the United States Trustee or any person employed in the Office of the United States Trustee.
6. KPC does not hold or represent an interest adverse to the estate and is a disinterested person.
7. KPC is a "disinterested person" as that term is defined in Section 101(14) of the Bankruptcy Code in that KPC and its shareholder:

- a. are not creditors, equity security holders or insiders of the Debtor;
- b. are not and were not, within two (2) years before the date of the filing of the Debtor's Petition, directors, officers, or employees of the Debtor; and
- c. does not hold an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.

8. I caused KPC to research the firm's database to determine whether KPC had any relationships with the Debtor and the creditors listed on the matrix and determined KPC does not represent the creditors in any capacity, related or unrelated to the Debtor's bankruptcy case or its estate. KPC has no adverse interest or connections with any creditor and is disinterested.

9. The hourly rates presently charged by the firm are as follows: Partners rates range from \$525.00 to \$675.00, of counsel rates are \$575.00, and Associates rates range from \$300.00 to \$325.00 per hour and Paralegal rates are \$180.00 per hour. The rates for services to the Trustee may change if the firm determines that the value of services to be rendered to clients, such as the Trustee, warrant an increase subject to providing the Office of the United States Trustee and all parties in interest ten (10) business days' notice before implementing any periodic rate increases by filing notice with the Bankruptcy Court.

10. I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

By: /s/ Robert W. Seitzer
ROBERT W. SEITZER

Dated: June 27, 2025